

## REMARKS

The Specification has been amended. Claims 1, 7 - 10, 15, 20, and 26 - 27 have been amended. Claims 33 - 34 have been added. No new matter has been introduced with these amendments or added claims, all of which are supported in the specification as originally filed. Claims 1, 7 - 10, 13 - 15, 18 - 20, 26 - 27, and 29 - 34 are now in the application.

### I. Objection to Replacement Drawing

Paragraph 5 of the Office Action dated November 20, 2006 (hereinafter, “the Office Action”) states that revised **Fig. 1** (submitted on 1/31/06) has not been accepted, “since this drawing is a copy of fig 1 as submitted on 9/30/2003”. Applicants respectfully disagree. In the originally-filed **Fig. 1**, first page, the group of lines near the bottom of the figure (under the comment line “//hide all”) uses the following values on the left-hand side (emphasis added):

**low.style.visibility**  
**medium.style.visibility**  
**high.style.visibility**

In the replacement version of **Fig. 1**, first page, filed on 1/31/06, this group of lines uses the following values on the left-hand side (emphasis added):

**basic.style.visibility**  
**intermediate.style.visibility**  
**premium.style.visibility**

The variable names in **Fig. 1** are thus aligned with their usage at element **125** (see **Fig. 1**, second page). Applicants apologize for any confusion caused, and respectfully request the

Examiner to enter the replacement version of **Fig. 1** filed on 1/31/06.

II. Rejection under 35 U. S. C. §103(a)

Paragraph 9 of the Office Action states that Claims 1, 7 - 10, 13 - 15, 18 - 20, 26 - 27, and 29 - 30 are rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent 6,300,947 to Kanevsky in view of U. S. Patent 6,023,714 to Hill et al. (hereinafter, "Hill"). Paragraph 10 of the Office Action states that Claims 31 - 32 are rejected under 35 U.S.C. §103(a) as being unpatentable over Kanevsky in view of Hill and further in view of U. S. Patent 6,463,440 to Hind. These rejections are respectfully traversed.

Applicants have amended their independent Claims 1, 26, and 27 herein to more clearly specify limitations of their claimed invention. With reference to the example shown in **Fig. 1** of Applicants' specification, the "alternative selectable views" are specified in this example at **140**, **150**, and **160**. Notably, each of these alternative views is specified in the markup language document itself (i.e., within document **100**); upon selecting one of the alternative views, the Web page is then rendered with that selected view included therein and the other non-selected views are omitted from the rendered Web page (as specified in Applicants' Claims 1, 26, and 27; see, for example, Claim 1, lines 3 - 8 and lines 12 - 15).

See also the corresponding examples of rendered Web pages in **Figs. 2A** and **2B**. In **Fig. 2A**, the text "Pirates of the Carribean" is rendered responsive to selecting the view

specified at **140** (see **141**, where this text is specified) and the other non-selected views **150** and **160** are omitted from rendered Web page **200**, whereas in **Fig. 2B**, an image (shown only in outline form for ease of illustration) is rendered responsive to selecting the view specified at **150** (see **151**, where this image is identified) and the other non-selected views **140** and **160** are omitted from rendered Web page **250**.

Applicants find no teaching in Kanevsky of “a markup language document that specifies a Web page for rendering on a display of the client device, wherein the specification of the Web page comprises, for a component that forms a portion of the Web page, syntax specifying a plurality of alternative selectable views of the component and conditions under which each of the views should be selected for inclusion as the portion of the Web page” (Claim 1, lines 3 - 8, emphasis added; see also Claim 26, lines 3 - 8). Claim 27 is similar, but specifies “... for each of at least two components ...” (Claim 27, lines 4 - 9, emphasis added).

Applicants find no teaching in Kanevsky of alternative selectable views of a [single] component where these views are specified in the markup language document for the Web page (Claim 1, lines 3 - 6). Note that the plurality of alternative “views” specified in Applicants’ claim language may also be considered as multiple (i.e., alternative) versions of the component – such as the textual version **141** versus the image version **151**, as discussed above with reference to **Fig. 1** and illustrated in **Figs. 2A** and **2B**. See p. 10, line 7 of Applicants’ specification, stating “... multiple versions (also referred to as multiple views) of a component

...” (emphasis added). Several differences between Applicants’ claim language and the cited references will now be described.

The cited text from col. 7, line 57 - col. 8, line 42 of Kanevsky discusses “web page data containing the URL/CGI instructions” (col. 7, lines 63 - 64) and states that “numeric data associated with the URL/CGI textual instructions” is read therefrom (col. 7, lines 64 - 66, emphasis added). Col. 8, lines 24 - 26 state that an interpreter module **202** provides this numeric data to a matching module **203**, and col. 8, lines 30 - 34 state that the matching module determines “whether objects ... included in the web page data will fit the particular size of a user’s display”. Col. 8, lines 35 - 37 then state “In other words, the matching module **203** checks whether reconstruction of all of this web page data will fit a display size ...” (emphasis added). If all of the web page data will fit (i.e., “If the matching module **203** determines that ... the web page as designed by the web page designer will fit the user’s display ...”), then the web page data is sent to the server without further change (col. 8, lines 38 - 43).

This is different from Applicants’ claimed invention, where a selection is made at the client (Claim 1, lines 12 - 13) and where this selection determines which one of the alternative selected views will be included in the rendered Web page and therefore which non-selected views will be omitted (Claim 1, lines 14 - 15). In other words, there is no scenario where “all of the web page data” is determined to fit on one page – in contrast to the approach discussed in col. 8, lines 24 - 43 of Kanevsky – because Applicants’ claimed approach pertains to

*selecting only one view to include on the page for a particular component and then omitting the other selectable views of that component (as discussed above with reference to Figs. 2A and 2B).* See lines 12 - 15 of Claim 1, stating “using the evaluation result ... to select a particular one of the plurality of alternative selectable views ...” and “rendering ... the Web page with the selected view included therein as the portion and each non-selected one of the views omitted therefrom” (emphasis added).

Whereas col. 8, lines 24 - 43 of Kanevsky discuss the “yes” answer to the “will all of this web page data fit” test, col. 8, line 44 - col. 9, line 18 discuss the “no” answer. This text states that a search module **205** is used in this case, and that “alternative URL/CGI instructions **201a - 201d** are provided to” this search module (col. 8, lines 44 - 45), where these alternative URL/CGI instructions “are model URL/CGI instructions ...” (col. 8, lines 45 - 47). By contrast, Applicants’ claimed approach does not search for alternatives; rather, a plurality of alternatives are specified in the markup language document (Claim 1, lines 3 - 6).

See also **Fig. 3** of Kanevsky, which depicts instructions **201a - 201d** as being separate from the “web pages URL/CGI” shown at **201**. By contrast, the alternative views in Applicants’ claimed approach are specified in the markup language document that specifies the Web page (Claim 1, lines 4 - 6, “... the specification of the Web page comprises ... syntax specifying a plurality of alternative selectable views ...”).

Col. 8, lines 49 - 51 of Kanevsky state that “These alternative models [i.e., instructions

**201a - 201d]** include textual instructions which include alternative numeric information ...”.

The search module described by Kanevsky uses, in a “quick comparison” (see col. 8, line 66) or “fast search” (see col. 9, line 4) approach, information from these instructions **201a - 201d** (such as a “special instruction” included as a first instruction within the alternative URL/CGI instructions **201a - 201d**; col. 8, lines 54 - 57) to determine which, if any, is the optimal model for the user’s display screen (col. 8, line 65 - col. 9, line 3). By contrast, Applicants’ claimed approach specifies that one of the “alternative selectable views” specified in the markup language document is [always] selected. See Claim 1, lines 12 - 15.

Kanevsky continues by stating that if an optimal model is found in the “fast search”, then the search module “provides the [matching] instruction set [selected from **201a - 201d**] to the server” for transmission to the client (col. 9, lines 3 - 6). See also col. 9, lines 8 - 12, stating that the located URL/CGI file is transmitted to the server “via connection **111a**”. On the other hand, when “the alternative URL/CGI instructions do not have a special instruction for quick comparison”, then an interpreter module **202** reads the numeric data from the alternative URL/CGI instructions and sends it to matching module **203** (col. 9, lines 19 - 23). This matching module does a “full data comparison” (col. 9, lines 23 - 24). If an optimal match is still not found, then “the original URL/CGI instructions (web page URL/CGI **201**) or closest alternative URL/CGI model **201a - 201d** is sent to an adaptation module **207**” (col. 9, lines 30 - 34). By contrast, as noted above, Applicants’ claimed approach specifies that one of the “alternative selectable views” specified in the markup language document is [always] selected. See Claim 1, lines 12 - 15.

Page 4 of the Office Action states that Kanevsky fails to explicitly teach “receiving ... a markup language document comprising [...] conditions under which each of the views should be selected for rendering ...”. Hill is then cited, referring to a web page which “contains a layout generator, which determines the type of modification to be performed on the web page”. Applicants claimed invention does not “modify” the Web page, but rather selects one of a plurality of selectable views to be used as the portion of a Web page (Claim 1, lines 5 - 8 and lines 12 - 15). The cited text from col. 9, lines 9 - 67 and col. 11, lines 4 - 23 of Hill discusses style sheets. See col. 9, lines 24 - 26, “The layout generator **212** ... selects a style sheet ...”. Col. 9, lines 50 - 54 state “Once the style sheet is selected, the client **20** uses the style sheet to render the document ... so that the format of the document content **202** is adapted for the display device” (emphasis added). In other words, as is known in the art, the style sheet is styling the content to have a particular format. This is different from Applicants’ claimed inventive approach, which does not specify altering content specified within a markup language document or altering the format of content specified within a markup language document. Rather, Applicants’ claims specify that one of a plurality of selectable views (where these views may alternatively be referred to as a plurality of selectable “versions”, as discussed earlier) of a component is selected, and that selected view is then included in the rendered Web page (whereas the non-selected views are omitted).

Applicants’ independent Claims 26 and 27 specify limitations analogous to those which have been discussed, above, with reference to Claim 1. The above-presented arguments therefore apply in an analogous manner to Claims 26 and 27.

A rejection under 35 U. S. C. §103 requires that the combination must teach all the claim limitations. MPEP, Section 706.02(j). As demonstrated above, neither Kanevsky nor Hill teaches all of the limitations of Applicants' independent Claims 1, 26, and 27 – and in particular, neither reference teaches selecting a particular one of a plurality of views which are specified, for a component that forms a portion of a Web page, in a markup language document and then including that one selected view (while omitting the non-selected views of that same component). Accordingly, the combination also fails to teach all of the limitations of Applicants' claim language. (Applicants also fail to find this teaching in Hind.)

Accordingly, Applicants respectfully submit that their independent Claims 1, 26, and 27 are patentable over Kanevsky and Hill. Dependent Claims 1, 7 - 10, 13 - 15, 18 - 20, 26 - 27, and 29 - 34 are therefore deemed patentable by virtue of (*inter alia*) the allowability of the independent claims from which they depend. See §2143.03 of the MPEP, which states that

If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious.

***In re Fine***, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

The Examiner is therefore respectfully requested to withdraw the §103 rejections of all claims as currently presented.

### III. Conclusion

Applicants respectfully request reconsideration of the objection to the drawing and the



pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all remaining claims at an early date.

Respectfully submitted,

/Marcia L. Doubet/ /#40,999/

Marcia L. Doubet  
Attorney for Applicants  
Reg. No. 40,999

Customer Number for Correspondence: 43168

Phone: 407-343-7586

Fax: 407-343-7587